

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

HARLEY KELCHNER, ANTHONY  
HICKS, DANIEL WECHE, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

CRST INTERNATIONAL HOLDINGS  
LLC, CRST EXPEDITED, INC., CRST  
SPECIALIZED TRANSPORTATION, INC.,  
CRST LINCOLN SALES, INC., JOHN  
SMITH, an individual, and MICHAEL  
GANNON, an individual,

Defendants.

Case No. 1:24-cv-00082-CJW-KEM

Honorable Judge C.J. Williams

**INDIVIDUAL DEFENDANTS' MOTION TO DISMISS**

Defendants, John Smith and Michael Gannon, respectfully request that the Court dismiss Plaintiffs' First Amended Complaint (ECF No. 113) for the reasons set forth in its accompanying Memorandum of Points and Authorities.

Dated: December 15, 2025

Respectfully submitted,

/s/ James H. Hanson

James H. Hanson (*pro hac vice*)

Angela S. Cash (*pro hac vice*)

Andrew J. Ireland (*pro hac vice*)

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